

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

CHRISTOPHER DANIEL GAY,)
AIS #253514,)
)
Plaintiff,) CIVIL ACTION NO: 2:07-CV-1012-MHT
)
v.)
)
WINDOM MCGHEE, et al.)
)
Defendants.)

MOTION TO EXPAND TIME

Come now the defendants and ask the court to grant an expansion of the time in which Defendants are required to file their Answer and Special Report, up to and including January 22, 2008, from the current date of December 31, 2007, and show the Court the following in support thereof:

1. The investigation into the claims of this case is not complete due to year-end holiday annual leave of named witnesses.
2. In order to provide the court with a full and complete Report and Answer, the Alabama Department of Corrections needs an additional twenty (20) days.
3. Plaintiff will not be prejudiced in any way.

Respectfully submitted,
KIM T. THOMAS (THO115)
DEPUTY ATTORNEY GENERAL
GENERAL COUNSEL

/s/ Neal P. Conner

NEAL P. CONNER (CONN2024)
ASSISTANT GENERAL COUNSEL

ADDRESS OF COUNSEL:

Alabama Department of Corrections
Legal Division
Post Office Box 301501
301 South Ripley Street
Montgomery, AL 36130-1501
(334)353-3889

CERTIFICATE OF SERVICE

I do hereby certify that on the 20th day of December, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system,

And I hereby certify that I have mailed a copy of the forgoing via United States Mail properly addressed, postage prepaid first class to:

Christopher Daniel Gay
AIS # 253514
Frank Lee Youth Center
P. O. Box 220410
Deatsville, AL 36022

/s/ Neal P. Conner
NEAL P. CONNER (CONN2024)
ASSISTANT GENERAL COUNSEL